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March 3, 2008

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Suite TW-A325
Washington, D.C. 20554

In Re: Alltel Communications, LLC
(FRN No. 0017176645)
CPNI Certifications Pursuant to
47 C.F.R. Sec. 64.2009(e)
EB Docket No. 06-36

Via Electronic Filing

Dear Ms. Dortch:

Alltel Communications, LLC. ("Alltel"), the successor in interest to Alltel Communications, Inc., transmits herewith, on behalf of itself, its wholly owned licensee subsidiaries and controlled licensee affiliates, its annual certification for that portion of calendar year 2007 from January 1st through December 7th regarding the use and protection of Customer Proprietary Network Information ("CPNI") as required by Section 64.2009(e) of the Commission's rules. This filing supersedes the certification covering the same time period that was electronically transmitted to the Commission on February 29, 2008.

Please address any questions regarding this transmittal to undersigned counsel either at the above-address or at (202) 783-3976.

Respectfully submitted,


Glenn S. Rabin

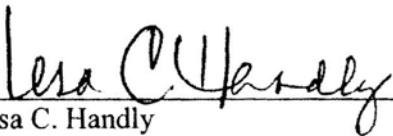
Vice President
Federal Communications Counsel
Alltel Communications, LLC

Attachments

CC: Enforcement Bureau, FCC
Best Copy and Printing, Inc.

ALLTEL COMMUNICATIONS, LLC
ANNUAL SECTION 64.2009(e) CERTIFICATION


I, Lesa C. Handly, a duly authorized officer of Alltel Communications, LLC ("Alltel") hereby certify on behalf of Alltel that I have personal knowledge that Alltel has operating procedures, as described in sections A through C of the attached STATEMENT OF OPERATING PROCEDURES IMPLEMENTING 47 C.F.R. SUBPART U GOVERNING USE OF CUSTOMER PROPRIETARY NETWORK INFORMATION, ("Statement") that, to the best of my knowledge, information and belief, are adequate, except as otherwise stated therein, to ensure compliance with the rules of the Federal Communications Commission set forth in 47 C.F.R. Subpart U, implementing Section 222 of the Communications Act of 1934, as amended.



Lesa C. Handly
Senior Vice President -
Customer Strategies
Alltel Communications, LLC
3 . 3, 2008

ALLTEL COMMUNICATIONS, LLC
ANNUAL SECTION 64.2009(e) CERTIFICATION

I, Gregory Schaffer, a duly authorized officer of Alltel Communications, LLC ("Alltel") hereby certify on behalf of Alltel that I have personal knowledge that Alltel has operating procedures, as described in sections D through G of the attached STATEMENT OF OPERATING PROCEDURES IMPLEMENTING 47 C.F.R. SUBPART U GOVERNING USE OF CUSTOMER PROPRIETARY NETWORK INFORMATION ("Statement"), that, to the best of my knowledge, information and belief, are adequate, except as otherwise stated therein, to ensure compliance with the rules of the Federal Communications Commission set forth in 47 C.F.R. Subpart U, implementing Section 222 of the Communications Act of 1934, as amended.



Gregory Schaffer
Chief Risk Officer
Alltel Communications, LLC
March 3, 2008

**STATEMENT OF OPERATING PROCEDURES IMPLEMENTING
47 C.F.R. SUBPART U GOVERNING USE OF
CUSTOMER PROPRIETARY NETWORK INFORMATION
FOR THE PERIOD JANUARY 1, 2007 TO DECEMBER 7, 2007**

The following explains how the operating procedures of Alltel Communications, LLC (formerly Alltel Communications, Inc., and collectively "Alltel")¹ ensures that it is in compliance with the Commission's CPNI rules, as referenced herein and set forth in 47 C.F.R. Subpart U.

A. CPNI Use and Customer Approval

In accordance with 47 CFR 64.2005(a), Alltel uses CPNI internally for the purpose of providing a customer with the requested service and for marketing service offerings within the categories of service to which the customer subscribes from Alltel. Alltel presently offers CMRS and information services. Consistent with 47 CFR 64.2005(b), Alltel does not use, disclose, or permit access to CPNI to market telecommunication service offerings outside the category of service to which the customer subscribes. Alltel uses CPNI derived from the provision of its CMRS services for the provision of CPE and information services. Alltel has not solicited customer consent to use CPNI in a manner that is beyond the existing service relationship and Alltel does not consider its customer's to have granted approval for such CPNI use. Alltel has a CPNI Marketing Policy which defines how CPNI may be used to market and provide services to Alltel customers. In accordance with that policy, Alltel requires that CPNI be used only for the purposes identified herein and as otherwise permitted.

B. Sales and Marketing Campaigns

Pursuant to 47 CFR 64.2009(a), Alltel reviews sales and marketing campaigns that use CPNI. All such campaigns are conducted to market services within the category of service the customer subscribes from Alltel in accordance with 47 CFR 64.2005(a). Alltel does not engage in cross service marketing campaigns. In addition and consistent with 47 CFR 64.2009(d), Alltel has a supervisory review process to evaluate the proposed use of CPNI in outbound marketing campaigns. Alltel restricts the ability to create marketing campaigns in order to ensure compliance with the CPNI rules. The persons with authority to approve campaigns which use CPNI are at a minimum Director level employees.

Consistent with 47 CFR 2009(c), Alltel maintains records of the campaigns which use CPNI that are conducted by authorized personnel. Alltel's Privacy Office conducts quarterly reviews of such campaign records to verify compliance with CPNI rules and Alltel policies. These records contain a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as a part of the campaign. This information is retained for at least one year. The results of the

¹ Alltel Communications, Inc. converted from a Delaware corporation to a Delaware limited liability company effective December 31, 2007.

quarterly reviews are also analyzed by the Privacy Office and Legal staff to verify compliance with CPNI rules.

C. Training and Disciplinary Process

Alltel employees who are authorized to conduct marketing campaigns are trained to keep customer data strictly confidential. Alltel's Privacy Office conducts periodic CPNI education for personnel who are authorized to conduct campaigns as required by 47 CFR 64.2009(b). Specifically, such personnel are instructed as to the proper access and use of CPNI. Each person authorized to conduct a marketing campaign utilizing CPNI received this education in 2007.

Alltel's CPNI Marketing Policy expressly establishes a disciplinary process applicable to employees in the event it is determined that such policy has been violated. A violation of such policy subjects the employee to disciplinary action, up to and including termination.

D. Security Governance

Alltel has established an "Enterprise Information Security Program" (EISP) designed to protect all of the data collected, generated, created, stored, managed, transmitted or otherwise handled by the Company. Pursuant to the EISP Alltel maintains a Security Steering Committee that includes (among others) the Chief Operating Officer, the General Counsel, the Chief Financial Officer, the Executive Vice President for Network Services and the Senior Vice Presidents of Human Resources and IT Services. Alltel's Chief Risk Officer is responsible for an Enterprise Security and Risk Office that develops, implements and enforces security and privacy policies on a company wide basis.

E. Billing Records, Network Records, and Information

Alltel maintains billing detail data, call detail data, and network record data in applications secured by networks, systems, policies and processes designed to control, monitor, and limit access to authorized users with legitimate business needs.

Internal governance processes dictate that newly created applications and significant changes to existing applications that process or store customer data must be formally reviewed and analyzed by appropriate security and privacy teams. Alltel's Enterprise Security and Risk team reviews new applications and enhancements for compliance with existing security and privacy policies, which include requirements for access and authentication controls. Alltel's Internal Audit Department routinely reviews applications to test for compliance with existing security procedures.

F. Data Centers

All data centers have processes and procedures in place for controlling physical access into the data centers along with controlling system access. Compliance with security policies are reviewed by the Enterprise Security and Risk team and Internal Audit on a recurring basis.

G. Safeguards on the Disclosure of CPNI

Alltel's account verification policy establishes the circumstances and limitations under which Alltel call center and retail employees are allowed to disclose CPNI. These employees are monitored and rated for compliance with Alltel's account verification procedures.

Alltel employees are trained to keep sensitive customer data strictly confidential and suspected breaches of customer confidentiality are investigated by corporate security teams. In addition to investigating reported incidents, security teams periodically conduct reviews of various systems to identify potential unauthorized access to customer data. Alltel requires newly-hired employees to sign an "Employee Agreement on Non-Disclosure and Non-Solicitation," which prohibits employees from disclosing information that is confidential to any third party. Confirmed unauthorized disclosures of customer information are subject to discipline, up to and including termination and referrals to law enforcement authorities where deemed appropriate.

Policies, practices and technologies are used to limit employee access to customer records on a business need basis. Initial access to a number of applications is controlled via an internal application that uses role-based logic and employee job requirements, as defined by the designated business owners, to limit access based on job function. Access to relevant financial reporting applications are reviewed quarterly by the designated business owner for Sarbanes-Oxley compliance. Quarterly reviews are also conducted of certain other applications containing sensitive customer or company data.

Alltel's privacy policy describes how Alltel uses, maintains and protects customer information, including CPNI. This policy is available to all customers and is available at www.alltel.com by clicking on 'Privacy Statement' at the bottom of the home page. In addition, Alltel's contracts with independent contractors that have access to confidential customer data are required to contain safeguards necessary to protect that data.